

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)	
)	
Telecommunications Relay Services)	CG Docket No. 03-123
and Speech-to-Speech Services for)	
Individuals with Hearing and)	
Speech Disabilities)	
)	
Structure and Practices of the)	CG Docket No. 10-51
Video Relay Service Program)	
)	

**RESPONSE TO SORESON COMMUNICATIONS PETITION FOR
RECONSIDERATION**

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Response to Petition for Reconsideration

On February 16, 2017, Sorenson Communications filed a petition for partial reconsideration of VTCSecure's access to the iTRS Number directory, based on "specifically, if VTCSecure is permitted to place the same telephone number available to hearing users into the Directory, that will cause providers to route all deaf-initiated calls to that number via a point-to-point call and will prevent deaf consumers from placing a VRS call to that number."

VTCSecure agrees with the Sorenson Communications that all deaf consumers should have the option to choose to use either VRS or direct video calling when contacting any organization. Fortunately, the VTCSecure platforms allows for this option as well as other choices which provides even more choice for the deaf consumer.

For example, if VTCSecure were to place the main number for the Social Security Administration ("SSA") into the iTRS database, then any call to SSA's main number would be directly routed to VTCSecure's platform. The very first screen would present the deaf consumer with the choice to "Connect to Direct ASL Services" or "Connect using VRS". If the deaf consumer chooses to "Connect using VRS", the deaf consumer would then be presented with a visual option screen in text and ASL which would allow them to choose which VRS provider they would like to make the call through. All valid VRS providers would be listed on the screen and the user could choose any provider using DTMF. After making their decision of what provider to use, the call would be immediately connected to the chosen VRS provider. This option can also include the

preferred language such as Spanish or English. There would also be listed on the screen a different number to call for VRS in the case a consumer's device doesn't support DTMF. This first screen option ensures the deaf consumer always have the choice to decide which communication method they would like to use to interact with any organization. Providing this choice addresses all the points made by Sorenson Communications in their petition for reconsideration.

The initial screen reached by the deaf consumer also has the ability to provide other information and options that would be beneficial to the deaf consumer, the fund and the organization. For example, the initial screen could show the potential wait time of the direct services queue and the hearing queue. This would allow a deaf consumer to choose the shortest queue for VRS or direct services. The first screen could also provide the option to use in-house VRS, which would allow a deaf consumer a choice to use a certified SSA trained interpreter. These interpreters would have better knowledge of scenarios and words used by SSA agents resulting in better overall communication and a better experience for the deaf consumer. This could also greatly reduce VRS minutes while at the same time using untapped resources such as in-house SSA interpreters. This initial screen is also critical to the organization as it provides information on how many of the calls entering their platform are from ASL deaf consumers despite which option they choose. This will allow them to better staff their call centers. This is basic information these organizations have today when consumers choose a specific language. Knowing how many consumers choose which option is critical for any organization who wants to implement direct ASL services.

Conclusion

Sorenson Communication's petition for reconsideration brings up the point that the user must always have choice to use either VRS or Direct Services. VTCSecure platform ensures the deaf consumers will continue to have that choice, as well as other potential options that are beneficial to the deaf consumer, the organization and the fund.